



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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2 **MEMORANDUM**

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4 **TO:** The Commission

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6 **FROM:** Lisa J. Stevenson  
7 Acting General Counsel

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9 Kathleen M. Guith  
10 Associate General Counsel for Enforcement

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12 Stephen A. Gura  
13 Deputy Associate General Counsel for Enforcement

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15 **BY:** Mark Allen *MA*  
16 Assistant General Counsel

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18 Delbert K. Rigsby *DKR*  
19 Attorney

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21 **SUBJECT:** MUR 7215 (Oklahoma Leadership Council) - Pre-Probable Cause Conciliation  
22 Agreement  
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25 On February 7, 2017, the Commission found reason to believe that Oklahoma Leadership  
26 Council ("Committee") violated 11 C.F.R. § 106.7(d)(1) by failing to maintain payroll logs on  
27 \$178,305 in salary payments during the 2012 election cycle to document the percentage of time  
28 that each employee spent on a Federal election.<sup>1</sup> The Commission also authorized pre-probable  
29 cause conciliation with the Committee and approved a conciliation agreement.<sup>2</sup> We are attaching  
30 a negotiated conciliation agreement that has been signed by the treasurer of the Committee.<sup>3</sup> We  
31 recommend that the Commission accept the negotiated agreement and close the file in this  
32 matter.  
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1 See Certification, MUR 7215 (Feb. 8, 2017).

2 *Id.*

3 Attachment I.

